

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES
PARCEL SELECT CONTRACT 22 (MC2017-155)
NEGOTIATED SERVICE AGREEMENT

Docket No. CP2017-219

**USPS MOTION FOR LATE ACCEPTANCE OF
SECOND QUARTERLY REPORT**
(October 31, 2019)

The United States Postal Service hereby moves for late acceptance of its second quarterly report, in response to Commission Order No. 5057 (issued April 15, 2019). In that Order, the Postal Service was directed to report on contract-specific volumes, costs, and workhours on a quarterly basis. The Postal Service's second quarterly report for this contract, covering Quarter 4 of FY 2019, is today being filed under seal. The Postal Service was unable to file its report yesterday because of the need for additional time to gather and verify the requested data, and for internal review. The Postal Service regrets the delay but submits that no party has been materially prejudiced.

Additionally, the Postal Service notes that the report filed today is based on preliminary data that may differ significantly from what will be available once final RPW and Billing Determinant final data can be used, as explained more fully in the Postal Service's Motion to Extend Deadline for Quarterly Reporting (filed October 15, 2019). The Postal Service hereby incorporates by reference its arguments in that Motion and respectfully requests that the Commission issue an order on that Motion as soon as practicable.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorney:

Elizabeth A. Reed

475 L'Enfant Plaza, SW
Washington, D.C. 20260-1137
(202) 268-3179
Elizabeth.A.Reed@usps.gov
October 31, 2019